

1 Name: TODD MICHAEL SCHULTZ

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3 WEST HOLLYWOOD, CA 90069

4 Phone: 310-435-5847

5 In Pro Per

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7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10  
11 TODD MICHAEL SCHULTZ

12 Plaintiff

13  
14 MICHAEL C. THOMPSON  
15 GREGORY R. HOLMES  
16 YOUTUBE LLC

17 Defendant(s).

CASE NUMBER:

2:23-CV-03452-JAK-MRWx

To be supplied by the Clerk of  
The United States District Court

MOTION TO COMPEL  
ANSWERS TO REQUEST FOR  
ADMISSIONS SERVE TO  
YOUTUBE LLC ON JULY  
11TH

19 PLAINTIFF, TODD MICHAEL SCHULTZ, pursuant to ARTICLE 1 rule  
20 2033.020 (b) A plaintiff may make requests for admission by a party without  
21 leave of court at any time that is 10 days eafter the service of the summons on, or  
22 appearance by, that party, whichever occurs first.

23 Mr. Tucker, counsel for Google LLC and or YouTube LLC emailed me to  
24 set up a 7-3 meeting on YouTube's LLC's motion to dismiss on July 13th. Plaintiff  
25 told Tucker the RFA was coming. Tucker objected, but Plaintiff saw it fit and per  
26 the law, served the Request For Admissions, he did so the next day, July 14th and  
27 now we are 32 days past the point they've been served, on July 11th. Plaintiff has  
28 proof of service lodged with the court prior to more than 30 days prior to today.

1 Mr. Tucker knows I expect answers to these questions immediately as we  
2 are well past 30 days they have had to answer. If none of these questions  
3 can be answered, according to Mr. Tucker's legal theory, there can be no  
4 dismissal. The questions seem to triple at the insistence by which NOT to  
5 answer questions about abuse incurred on their platform with many  
6 reports.  
7

8  
9 Plaintiff is pro per requests the court compel testimony in the form of  
10 admissions or denials to any question they find appropriate, whether it be  
11 all of them, half of them, or if they must parse questions. Plaintiff  
12 contends some info must be learned before YouTube even has a right to  
13 enter a hearing for dismissal.  
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17 Dated: Friday August 19th, 2023

Signed by:

Todd Michael Schultz

In Pro Per

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18 **counsel For Mr. Holmes and Mr. Thopmpson**

19 **Mr. Thompson and Mr. Holmes' counsel**

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26 **counsel for Google LLC and YouTube LLC**

27 **Conor Tucker (he/him) |**  
28 Wilson Sonsini Goodrich & Rosati  
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